

EXHIBIT G

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

In re: NEURONTIN MARKETING, SALES PRACTICES,
AND PRODUCTS LIABILITY LITIGATION

:
MDL Docket No. 1629
:

:
Master File No. 04-10981
:

THIS DOCUMENT RELATES TO:

:
Judge Patti B. Saris
:

Smith v. Pfizer Inc., et al., C. A. No. 05-11515-PBS

:
Magistrate Judge Leo T. Sorokin
:
:

DEFENDANTS' SECOND SUPPLEMENTAL DISCLOSURE STATEMENT

PLEASE TAKE NOTICE, that pursuant to Rule 26(a)(1) of the Federal Rules of Civil Procedure, Defendants Pfizer Inc., Parke-Davis, a division of Warner-Lambert Company and Warner-Lambert Company LLC, Warner-Lambert Company, and Warner Lambert Company LLC ("Defendants") make and supplement their disclosures as follows:

These responses are made subject to all objections as to competence, materiality, relevance, or other objections as to admissibility that may apply in the event that any such response, or the information contained in it, is sought to be used in court. Defendants expressly reserve all such objections.

- A. **Rule 26(a)(1)(A): The name and, if known, the address and telephone number of each individual likely to have discoverable information that the disclosing party may use to support its claims or defenses, unless solely for impeachment, identifying the subjects of the information.**

Discovery and investigation in these actions are on-going. Based on the information reasonably available, Defendants are unable at the present time to identify each and every individual who would have discoverable information that the Defendants may use to support their claims or defenses in the case, and the subjects of such information. Defendants reserve

the right to supplement these disclosures as they become aware of additional individuals who have such information.

Subject to the foregoing and without waiver of any of Defendants' rights, the following individuals may have information that Defendants may use to support their claims and defenses in this action:

A1. Plaintiff:

Ruth Smith, Individually and as Widow for the Use and Benefit of Herself and the Next of Kin of Richard Smith, Deceased.

A2. Members of Plaintiff's and decedent's family, including but not limited to:

Wes Carnahan
Drew Charlton
Buford Hoskins
Sherri Hoskins
Gayle Lawson
Gene Lawson
Cindy Smith-Charlton

A3. Health care providers and prescribing and/or treating physicians and psychiatrists, including but not limited to:

James Robert Cato, M.D.
Heritage Medical Associates
2325 Crestmoor Road
Nashville, TN 37215
615.324.2158

Dr. Joseph Cheng
Neurological Surgery Clinic
Village at Vanderbilt
1500 21st Ave S, Suite 1506
Nashville, TN 37212
615.343.9549

Carl R. Hampf, M.D
Neurological Surgeons, P.C.
2410 Patterson Street, Suite 500
Nashville, TN 37203
AND

2011 Murphy Avenue, Suite 401
Baptist Tower North
Nashville, TN 37203
615.327.9545

Pam Krancer, R.N., C.S., C.N.R.N.
Neurological Associates
Centennial Professional Plaza
345 23rd Avenue North, Suite 320
Nashville, TN 37203

Edward S. Mackey, M.D.
Tennessee Orthopaedic Alliance
Suite 1000, St. Thomas Medical Plaza East
4230 Harding Road
Nashville, TN 37205

Paul R. McCombs, III, M.D.
Howell Allen Clinic
2011 Murphy Avenue, Suite 401
Baptist Tower North
Nashville, TN 37203
615.327.9545

Stewart Stowers, M.D.
Tennessee Orthopaedic Alliance
301 21st Avenue North
Nashville, TN 37203
615.329.6600

Dr. W. Scott West
Associated Psychiatrists
30 Burton Hills Blvd. #375
Nashville, TN 37215
615.327.4877

Christopher L. Wood, D.D.S.
1502 17th Avenue South
Nashville, TN 37212
615.463.7884

- A4. Hospital, police, medical examiner, and emergency personnel who investigated the incident, including but not limited to:

Dr. Feng Li
Assistant Medical Examiner

FORENSIC MEDICAL
850 R S Gass Blvd.
Nashville, TN 37216
615.743.1800
615.743.1890 – Fax

Gary Biggs
Investigator
FORENSIC MEDICAL
850 R S Gass Blvd.
Nashville, TN 37216
615.743.1800
615.743.1890 – Fax

Det. Danny Satterfield
NASHVILLE POLICE DEPARTMENT - NORTH PRECINCT
2231 26th Avenue North
Nashville, TN 37208
615.862.4410

David Nelson Crowder
Retired
3008 Palomino Pl
Hermitage, TN 37076-3900
615.872.7070

- A5. Defendants' current and former employees and representatives with knowledge regarding Neurontin identified and/or disclosed to Plaintiff during the course of discovery.
- A6. The following persons who attended the July 10, 2008 Joint Meeting of the Peripheral and Central Nervous System Drugs Advisory Committee (PCNS) and the Psychopharmacologic Drugs Advisory Committee (PDAC):

Rochelle Caplan, M.D.
Semel Institute for Neuroscience and Human Behavior
University of California at Los Angeles
760 Westwood Plaza, Rm. 48-269
Los Angeles, CA 90024

Joyce Cramer
President, Epilepsy Therapy Project
Yale University School of Medicine
950 Campbell Ave.
West Haven, CT 06516-2770

Jacqueline French
New York University
NYU Langone Medical Center
530 First Ave.
New York, NY 10016

Frank Gilliam, M.D.
Epilepsy Foundation
8301 Professional Place
Landover, MD 20785

Wayne Goodman, M.D.
National Institute of Mental Health
6001 Executive Boulevard
Room 7123, MSC 9632
Bethesda, MD

Sean Hennessy, Ph.D.
University of Pennsylvania
423 Guardian Drive
803 Blockley Hall
Philadelphia, PA 19104

Lily K.F. Jung, M.D.
Swedish Neuroscience Institute
600 Broadway
Suite 200
Seattle, WA 98122

Daniel S. Pine, M.D.
National Institute of Mental Health
Intramural Research Program
Building 1, Room B310-0135
1 Center Drive MSC 0135
Bethesda, MD 20895

Darrel Regier, M.D.
American Psychiatric Association
1000 Wilson Boulevard, Suite 1825
Arlington, VA 22209

Matthew Rizzo, M.D.
University of Iowa
Department of Neurology
200 Hawkins Drive
Iowa City, IA 52242

Christopher Wohlberg
Pfizer Inc.
New York, NY

- A7. Members of the American Epilepsy Society expert panel that reviewed FDA's meta-analysis of antiepileptic drugs:

Dennis Spencer, M.D.
American Epilepsy Society
Yale University School of Medicine
Department of Neurosurgery
P.O. Box 208082
New Haven, CT 06520

Andres Kanner, M.D.
Rush Medical Center
1725 W. Harrison St.
Suite 1118
Chicago, IL 60612

Dale Hesdorffer, M.D.
Columbia University
630 West 168th Street, P & S unit 16, PH 19, Room 308
New York, NY 10032

Anne Berg, Ph.D.
Northern Illinois University
Department of Biological Sciences
MO 429A; Lab 429
DeKalb, IL 60115

John Barry, M.D.
Stanford University
401 Quarry Road MC5723
Stanford, CA 94305-5723

Rochelle Caplan, M.D.
Semel Institute for Neuroscience and Human Behavior
University of California at Los Angeles
760 Westwood Plaza, Rm. 48-269
Los Angeles, CA 90024

Jacqueline French
New York University
NYU Langone Medical Center
530 First Ave.

New York, NY 10016

- A8. All witnesses identified in Defendants' Disclosure of Expert Testimony.
- A9. All witnesses required for the authentication of documents and things.
- A10. All witnesses identified in Defendants' prior Rule 26 disclosures.
- A11. All witnesses identified in Plaintiff's Rule 26 disclosures and/or otherwise identified or disclosed by Plaintiff.
- A12. All other witnesses disclosed or identified by Defendants to Plaintiff during the course of discovery.

To the extent any additional discovery and investigation provide additional facts and legal contentions that may substantially alter these disclosures, Defendants reserve the right to amend or supplement without prejudice any and all disclosures herein consistent with those developments, including product identification, identifying other relevant witnesses and additional areas of information which support Defendants' defenses in this case and identifying additional individuals with discoverable information that may be used to support their claims or defenses in this case.

- B. Rule 26(a)(1)(B): A copy of, or a description by category and location of, all documents, data compilations, and tangible things that are in the possession, custody, or control of the party and that the disclosing party may use to support its claims or defenses, unless solely for impeachment.**

Discovery and investigation in these actions are on-going. Defendants are unable at the present time, based on information reasonably available, to identify all documents, compilations, and tangible things, if any, that Defendants may use to support claims or defenses in this case and the subject of such information.

Subject to the foregoing and without waiving any of Defendants' rights, Defendants submit the following list:

- B1. Medical records in the possession or control of Plaintiff, Plaintiff's attorneys or health care providers.
- B2. Medical, prescription, insurance and other records regarding Plaintiff's decedent, including but not limited to:

Action Quick Corporation
Medical and Billing Records

Associated Urologists of Nashville
Certifications of No Medical and Billing Records

Baptist Hospital Medical Records
Pathology Slides/Blocks

Berklacich, Frank M. MD
Medical and Billing Records

Blue Cross and Blue Shield of Tennessee
Insurance Records

Cardiology Group of Middle Tennessee
Medical Records

Centennial Medical Center
Medical and Billing Records

Centers for Medicare and Medicaid Services
Claims Records

Church of Christ At Trinity Lane
Certification of No Records

Colon & Rectal Surgery Associates
Medical Records and Certification of No Billing Records

Crawford, Myles A. DC / Powers Chiropractic Clinic
Medical Records

CVS Privacy Office
Certification of No Records

Death Certificate

Dyer, David N. MD
Certifications of No Medical and Billing Records

Eckerd Drugs
Pharmacy Records

Elite Sports Med & Orthopedic Center
Certifications of No Medical and Billing Records

Forensic Medical
Medical Examiner Records and Photos

Gilroy Church of Christ
Certification of No Records

Hampf, Carl MD
Medical and Billing Records

Harwell, William B., Jr. MD
Medical and Billing Records

Health Insurance Information
Insurance Cards

Heart & Vascular Clinic
Medical and Billing Records

Heritage Medical Associates
Medical and Billing Records

Jackson Park Church of Christ
Certification of No Records

Loden Vision Center
Medical and Billing Records

Metropolitan Nashville Police Department
Incident Report and Supplements

Midstate Cardiology
Certification of No Records

Mohs Micrographic Surgery And Dermatology
Medical Records

Nashville Internal Medicine Associates
Certifications of No Medical, Billing or Insurance Records

Nashville Office Machines
Employment Records

Nashville Orthopaedic Associates
Medical Records

National Health Laboratories
Lab Reports

Neurological Surgeons
Medical and Billing Records

Neurosurgical Associates
Medical and Billing Records

Otolaryngology Associates of Tennessee
Medical and Billing Records and Certification of Destroyed Records

Outpatient Diagnostic Center
Medical Records

Premier Orthopedics and Sports Medicine
Medical Records

Premier Radiology
Medical Records

Income Tax Records

Emergency Communications Center
Recording of 911 Calls

Rite Aid Corporation
Certification of No Pharmacy Records

Saint Thomas Hospital
Medical Records

Schull, David M., M.D.
Certifications of No Medical, Billing and Insurance Records

Southern Sports Medicine
Certifications of No Medical and Billing Records

Spalding & Nesbitt Urology Clinic
Medical and Billing Records

Specialized Assays
Medical Records

Sports Medicine Center
Certifications of No Medical and Billing Records

Stasko, Dr. Thomas
Medical Records

Suicide Note

Tennessee Orthopaedic Alliance
Medical Records

University Medical Center
Medical Records and Certification of No Pathology Records

Urology Associates
Medical Records and Certification of No Billing Records

Vanderbilt Patient Accounting
Billing Records

Vanderbilt University Medical Center
Medical Records

W-2 Forms

Willowbrook Home Care Agencies
Medical Records

Willowbrook Home Health Care
Letter re No Records

Wood, Christopher L. D.D.S.
Dental Records and Dr. Wood's letter dated 05/19/04

Notes of Richard Smith (added to certain medical records)

- B3. Plaintiff's decedent's tissue, blood, fluid, or serum samples, and pathology slides.
- B4. Plaintiff's decedent's unused Neurontin samples.
- B5. All deposition transcripts and documents and things attached as exhibits to the depositions in MDL-1629, including the depositions taken in this case.

- B6. Documents and things referenced and/or relied upon by the expert witnesses disclosed in Defendants' Disclosure of Expert Testimony.
- B7. All exhibits and other materials submitted in support of Defendants' Motion to Exclude the Testimony of Doctors Trimble, Kruszewski, and Blume on the Issue of General Causation (MDL), Motion for Summary Judgment (MDL), Motion to Exclude the Specific Causation Testimony of Doctor Maris and Professor Trimble (*Smith*), and Motion for Summary Judgment (*Smith*), including any supplemental filings in support of these motions.
- B8. All exhibits required for authentication of documents and things.
- B9. Published medical and scientific literature concerning Neurontin and Plaintiff's decedent's medical conditions.
- B10. Product information concerning Neurontin, including but not limited to package inserts.
- B11. Relevant documents contained in regulatory files, including but not limited to the Investigational New Drug Application ("IND"), New Drug Application ("NDA"), Supplemental New Drug Applications ("sNDA"), and safety surveillance and analysis files for Neurontin.
- B12. All documents and things identified in Defendants' prior Rule 26 disclosures.
- B13. All documents and things identified in Plaintiff's Rule 26 disclosures and/or otherwise identified or provided by Plaintiff.
- B14. All other documents and things produced, disclosed, or identified by Defendants to Plaintiff during the course of discovery.

To the extent any additional discovery and investigation provides additional facts and legal contentions that may substantially alter these disclosures, Defendants reserve the right to amend or supplement without prejudice any and all disclosures herein consistent with these developments, including identifying additional areas of information, relevant documents, and tangible things that support their claims or defenses in this case.

Pursuant to Fed. R. Civ. P. 26(b)(5), Defendants object to disclosure or production of documents and materials generated during the course of this litigation that constitute attorney work product or that contain privileged attorney-client communications. These

documents and materials may consist, among others, of communications or correspondence between counsel and Defendants, correspondence between counsel and consulting experts, and between Defendants and employees to facilitate the rendering of legal advice. These documents may be exempt from discovery pursuant to Fed. R. Civ. P. 26(b)(3), 26(b) (4)(B), and/or the applicable attorney-client and/or joint defense privilege.

Moreover, if Defendants identify certain documents that they believe contain trade secrets and other confidential research, development, or commercial information, such documents will be produced subject to the Amended Stipulated Protective Order entered by the Court.

C. Rule 26(a)(1)(C): A computation of any category of damages claimed by the disclosing party.

Not applicable.


D. Rule 26(a)(1)(D): For inspection and copying as under Rule 34 any insurance agreement under which any person carrying on an insurance business may be liable to satisfy part or all of the judgment which may be entered in the action or to indemnify or reimburse for payments made to satisfy the judgment.

Defendants are self-insured and have assets sufficient to satisfy any judgment that may be rendered in this matter.

Dated: March 4, 2009

Respectfully submitted,

SHOOK, HARDY & BACON L.L.P.

By  _____
Scott W. Sayler
Lori McGroder
Lori Schultz

2555 Grand Blvd.
Kansas City, MO 64108
(816) 474-6550

David B. Chaffin
WHITE AND WILLIAMS
BBO #549245
100 Summer Street, 27th Floor
Boston, MA 02110
(617) 748-5200

ATTORNEYS FOR DEFENDANTS
PFIZER INC., PARKE-DAVIS, A
DIVISION OF WARNER-LAMBERT
COMPANY AND WARNER-LAMBERT
LLC, WARNER-LAMBERT COMPANY,
AND WARNER-LAMBERT COMPANY
LLC


CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing Defendants' Second Supplemental Disclosure Statement was served on March 4, 2009, via electronic mail and U.S. mail, upon:

Jack London
3701 Bee Caves Road
Suite 200
Austin, TX 78746

Andrew G. Finkelstein
Eleanor L. Polimeni
Kenneth B. Fromson
Finkelstein & Partners LLP
436 Robinson
Newburgh, NY 12550

Thomas M. Sobol
Edward Notargiacomo
Hagens Berman Sobol Shapiro LLP
One Main Street
4th Floor
Cambridge, MA 02142



ATTORNEY FOR DEFENDANTS PFIZER
INC., PARKE-DAVIS, A DIVISION OF
WARNER-LAMBERT COMPANY AND
WARNER-LAMBERT LLC, WARNER-
LAMBERT COMPANY, AND
WARNER-LAMBERT COMPANY LLC

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

----- :
In re: NEURONTIN MARKETING, SALES PRACTICES, : MDL Docket No. 1629
AND PRODUCTS LIABILITY LITIGATION :
----- : Master File No. 04-10981
THIS DOCUMENT RELATES TO: : Judge Patti B. Saris
----- :
Bulger v. Pfizer Inc., et al., C. A. No. 07-11426-PBS : Magistrate Judge Leo T. Sorokin
----- :

DEFENDANTS' THIRD SUPPLEMENTAL DISCLOSURE STATEMENT

PLEASE TAKE NOTICE, that pursuant to Rule 26(a)(1) of the Federal Rules of Civil Procedure, Defendants Pfizer Inc., Parke-Davis, a division of Warner-Lambert Company and Warner-Lambert Company LLC, Warner-Lambert Company, and Warner Lambert Company LLC ("Defendants") make and supplement their disclosures as follows:

These responses are made subject to all objections as to competence, materiality, relevance, or other objections as to admissibility that may apply in the event that any such response, or the information contained in it, is sought to be used in court. Defendants expressly reserve all such objections.

- A. **Rule 26(a)(1)(A): The name and, if known, the address and telephone number of each individual likely to have discoverable information that the disclosing party may use to support its claims or defenses, unless solely for impeachment, identifying the subjects of the information.**

Discovery and investigation in these actions are on-going. Based on the information reasonably available, Defendants are unable at the present time to identify each and every individual who would have discoverable information that the Defendants may use to support their claims or defenses in the case, and the subjects of such information. Defendants reserve the

right to supplement these disclosures as they become aware of additional individuals who have such information.

Subject to the foregoing and without waiver of any of Defendants' rights, the following individuals may have information that Defendants may use to support their claims and defenses in this action:

A1. Plaintiff:

Ronald Bulger, Sr. as Administrator of the Estate of Susan Bulger, Deceased.

A2. Members of Plaintiff's and decedent's family, including but not limited to:

Ronald Bulger, Jr.
Regina Bulger
Patricia Bulger
Linda Landry
James Gibbons
Steven Scialdone
Nancy Scialdone

A3. Health care providers and prescribing and/or treating physicians and psychiatrists, including but not limited to:

Dino Crognale, M.D.
Danvers Family Doctors
75 Lindall St.
Danvers, MA 01923

Richard Goldman, M.D.
Access M.D.
873 Worcester Street, Suite 4
Wellesley, MA 02482

Daniel J. McCullough, M.D.
900 Cummings Center
Suite 107W
Beverly, MA 01915

William J. Medwid, M.D.
15 Railroad Ave
Hamilton, MA 01982

Walter H. Jacobs, M.D.
795 Turnpike Road
North Andover, MA 01845

Mark Mengel, M.D.
University of Arkansas for Medical Sciences
4301 W. Markham, #599
Little Rock, AR 72205

Joanne Swindell, LCSW
CAB Health & Recovery Services
111 Middleton Road
Danvers, MA 01923

Melissa Defilippi, LCSW
CAB Health & Recovery Services
111 Middleton Road
Danvers, MA 01923

Julia Carmel, LCSW
Tri-City Mental Health
95 Pleasant Street
Lynn, MA 01901

Thomas Thornhill, M.D.
Brigham and Women's Hospital
75 Francis Street
Boston, MA 02115

Yoshiharu Akabane, M.D.
The Psychiatric Group of the North Shore, P.C.
Brookside Square Mall
30 Boston Street
Lynn, MA 01904

Chaim Rosenberg, M.D.,
The Psychiatric Group of the North Shore, P.C.
Brookside Square Mall
30 Boston Street
Lynn, MA 01904

Dwight R. Robinson, M.D.
Mass General Hospital
Bullfinch 1-Arthritis Unit
Boston, MA 02114

Diana Zantos-Beaupre, M.D.
Harvard Vanguard Medical Associates
Two Essex Center Drive
Peabody, MA 01960

Howard E. Abrams, M.D.
100 Highland Ave., Suite 204
Salem, MA 01970

Raymond T. Chung, M.D.
Mass General Hospital
GI Unit, GRJ 724
Boston, MA 02114

Murray J. Goodman, M.D.
9 Colby Street
Salem, MA 01970

John Gallagher, M.D.
BayRidge Hospital d/b/a
Beverly Hospital
85 Herrick Street
Beverly, MA 01915

Tracy Gilmore
MA Dept. of Social Services
Cape Ann/Salem
45 Congress Street, Building 4
Salem, MA 01970

Healthcare provider(s) at
Spaulding Rehabilitation Hospital
125 Nashua Street
Boston, MA 02114

Healthcare provider(s) at
Harborside Healthcare
44 Summer Street
Danvers, MA 01923

Healthcare provider(s) at
Lynnfield Medical Associates
2 Essex Center Drive
Peabody, MA 01960

Healthcare provider(s) at
Adcare Outpatient Clinic
14 Beacon Street, Suite 510
Boston, MA 02108

Healthcare provider(s) at
North Shore Psychiatric Assoc.
100 Highland Ave, Suite 204
Salem, MA 01970

Healthcare provider(s) at
Somerville Hospital
230 Highland Avenue
Somerville, MA 01243

Healthcare provider(s) at
NSMC Union Hospital
500 Lynnfield Street
Lynn, MA 01904

Healthcare provider(s) at
Lahey Clinic Medical Center
41 Mall Road
Burlington, MA 01805

Healthcare provider(s) at
Beverly Hospital
85 Herrick Street
Beverly, MA 01915

Healthcare provider(s) at
McLean Hospital
115 Mill Street
Belmont, MA 02478

Healthcare provider(s) at
Bay Cove Human Services
66 Canal Street
Boston, MA 02114

Caseworker(s) for
MA Dept. of Social Services
Cape Ann/Salem
45 Congress Street, Building 4
Salem, MA 01970

Caseworker(s) for
Social Security Admin.
Museum Place, 10 Federal St., Suite 406
Salem, MA 01970

- A4. Hospital, police, medical examiner, and emergency personnel who investigated the incident, including but not limited to:

Individual(s) from
Peabody Police Department
6 Allens Lane
Peabody, MA 01960

Sgt. Matt Gravini
Massachusetts State Police
Detective Unit, Essex County
Museum Place, Two East India Square
Salem, MA 01970

Individual(s) from
Massachusetts State Police
Detective Unit, Essex County
Museum Place, Two East India Square
Salem, MA 01970

A representative of the
Office of the Chief Medical Examiner
720 Albany St.
Boston, MA 02118

Barry McEachern
Northshore Ambulance Inc.
63 Grove Street
Salem, MA 01970

Responding personnel for
Northshore Ambulance Inc.
63 Grove Street
Salem, MA 01970

- A5. Other witnesses identified through discovery who knew the decedent and/or may have knowledge of the Bulger family or activities in or around the Bulger home before and/or after the death of the decedent:

Amanda Cavallaro
17 Bayview Ave.
Beverly, MA 01915

Police personnel from Lynn Police Department
300 Washington St.
Lynn, MA 01902

Russell Gallant
15 Elaine Ave.
Peabody, MA 01960

Teresa (Betty) Gallant
15 Elaine Ave.
Peabody, MA 01960

Kimberly Rochon
53 Lynn St.
Peabody, MA 01960

Cheryl Nadeau
1-B Patriots Way
Sterling, MA 01564

- A6. Defendants' current and former employees and representatives with knowledge regarding Neurontin identified and/or disclosed to Plaintiff during the course of discovery.
- A7. The following persons who attended the July 10, 2008 Joint Meeting of the Peripheral and Central Nervous System Drugs Advisory Committee (PCNS) and the Psychopharmacologic Drugs Advisory Committee (PDAC):

Rochelle Caplan, M.D.
Semel Institute for Neuroscience and Human Behavior
University of California at Los Angeles
760 Westwood Plaza, Rm. 48-269
Los Angeles, CA 90024

Joyce Cramer
President, Epilepsy Therapy Project
Yale University School of Medicine
950 Campbell Ave.
West Haven, CT 06516-2770

Jacqueline French
New York University
NYU Langone Medical Center
530 First Ave.

New York, NY 10016

Frank Gilliam, M.D.
Epilepsy Foundation
8301 Professional Place
Landover, MD 20785

Wayne Goodman, M.D.
National Institute of Mental Health
6001 Executive Boulevard
Room 7123, MSC 9632
Bethesda, MD

Sean Hennessy, Ph.D.
University of Pennsylvania
423 Guardian Drive
803 Blockley Hall
Philadelphia, PA 19104

Lily K.F. Jung, M.D.
Swedish Neuroscience Institute
600 Broadway
Suite 200
Seattle, WA 98122

Daniel S. Pine, M.D.
National Institute of Mental Health
Intramural Research Program
Building 1, Room B310-0135
1 Center Drive MSC 0135
Bethesda, MD 20895

Darrel Regier, M.D.
American Psychiatric Association
1000 Wilson Boulevard, Suite 1825
Arlington, VA 22209

Matthew Rizzo, M.D.
University of Iowa
Department of Neurology
200 Hawkins Drive
Iowa City, IA 52242

Christopher Wohlberg
Pfizer Inc.
New York, NY

- A8. Members of the American Epilepsy Society expert panel that reviewed FDA's meta-analysis of antiepileptic drugs:

Dennis Spencer, M.D.
American Epilepsy Society
Yale University School of Medicine
Department of Neurosurgery
P.O. Box 208082
New Haven, CT 06520

Andres Kanner, M.D.
Rush Medical Center
1725 W. Harrison St.
Suite 1118
Chicago, IL 60612

Dale Hesdorffer, M.D.
Columbia University
630 West 168th Street, P & S unit 16, PH 19, Room 308
New York, NY 10032

Anne Berg, Ph.D.
Northern Illinois University
Department of Biological Sciences
MO 429A; Lab 429
DeKalb, IL 60115

John Barry, M.D.
Stanford University
401 Quarry Road MC5723
Stanford, CA 94305-5723

Rochelle Caplan, M.D.
Semel Institute for Neuroscience and Human Behavior
University of California at Los Angeles
760 Westwood Plaza, Rm. 48-269
Los Angeles, CA 90024

Jacqueline French
New York University
NYU Langone Medical Center
530 First Ave.
New York, NY 10016

- A9. All witnesses identified in Defendants' Disclosure of Expert Testimony.
- A10. All witnesses required for the authentication of documents and things.
- A11. All witnesses identified in Defendants' prior Rule 26 disclosures.
- A12. All witnesses identified in Plaintiff's Rule 26 disclosures and/or otherwise identified or disclosed by Plaintiff.
- A13. All other witnesses disclosed or identified by Defendants to Plaintiff during the course of discovery.

To the extent any additional discovery and investigation provide additional facts and legal contentions that may substantially alter these disclosures, Defendants reserve the right to amend or supplement without prejudice any and all disclosures herein consistent with those developments, including product identification, identifying other relevant witnesses and additional areas of information which support Defendants' defenses in this case and identifying additional individuals with discoverable information that may be used to support their claims or defenses in this case.

- B. Rule 26(a)(1)(B): A copy of, or a description by category and location of, all documents, data compilations, and tangible things that are in the possession, custody, or control of the party and that the disclosing party may use to support its claims or defenses, unless solely for impeachment.**

Discovery and investigation in these actions are ongoing. Defendants are unable at the present time, based on information reasonably available, to identify all documents, compilations, and tangible things, if any, that Defendants may use to support claims or defenses in this case and the subject of such information.

Subject to the foregoing and without waiving any of Defendants' rights, Defendants submit the following list:

- B1. Medical records in the possession or control of Plaintiff, Plaintiff's attorneys or health care providers.
- B2. Medical, prescription, employment, insurance and other records regarding Plaintiff's decedent, including but not limited to:

Danvers Family Doctors
Medical and Billing records

Access M.D.
Medical and Billing records

Daniel J. McCullough, M.D.
Medical and Billing records

William J. Medwid, M.D.
Medical and Billing records

Walter H. Jacobs, M.D.
Medical and Billing records

CAB Health & Recovery Services
Medical and Billing records

Tri-City Mental Health
Medical and Billing records

Brigham and Women's Hospital
Medical and Billing records

The Psychiatric Group of the North Shore, P.C.
Medical and Billing records

Mass General Hospital
Medical and Billing records

Harvard Vanguard Medical Associates
Medical and Billing records

Howard E. Abrams, M.D.
Medical and Billing records

Murray J. Goodman, M.D.
Medical and Billing records

BayRidge Hospital d/b/a
Beverly Hospital
Medical and Billing records

Spaulding Rehabilitation Hospital
Medical and Billing records

Harborside Healthcare
Medical and Billing records

Lynnfield Medical Associates
Medical and Billing records

Adcare Outpatient Clinic
Medical and Billing records
North Shore Psychiatric Assoc.
Medical and Billing records

Somerville Hospital
Medical and Billing records

NSMC Union Hospital
Medical and Billing records

Lahey Clinic Medical Center
Medical and Billing records

Beverly Hospital
Medical and Billing records

McLean Hospital
Medical and Billing records

Bay Cove Human Services
Medical and Billing records

Peabody Police Department
Investigative records

Massachusetts State Police
Investigative records

Office of the Chief Medical Examiner
Investigative records

Northshore Ambulance Inc.
Investigative records

MA Dept. of Social Services
Investigative records
Social Security Admin.

Investigative records

Centers for Medicare & Medicaid Services
Insurance and Medical records

Mass Health Privacy Office
Insurance and Medical records

Essex County District Attorney
Investigative records

Essex County Probate and Family Court
Court Records

Lynn Police Department
Investigative records

Eaton Apothecary
Pharmacy and Billing records

The Medicine Shoppe
Pharmacy and Billing records

Walgreens
Pharmacy and Billing records

CVS (Caremark)
Pharmacy and Billing Records

WH Smith Gift Shop
Sheraton Hotel
Employment records

The Sheraton Ferncroft Resort &
CoCo Key Water Park
Employment records

- B3. Plaintiff's decedent's tissue, blood, fluid, or serum samples, and pathology slides.
- B4. All deposition transcripts and documents and things attached as exhibits to the depositions in MDL-1629, including the depositions taken in this case.
- B5. Documents and things referenced and/or relied upon by the expert witnesses disclosed in Defendants' Disclosure of Expert Testimony.
- B6. All exhibits and other materials submitted in support of Defendants' Motion to Exclude the Testimony of Doctors Trimble, Kruszewski, and Blume on the Issue of General Causation (MDL), Motion for Summary Judgment (MDL), Motion to

Exclude the Specific Causation Testimony of Doctors Ronald W. Maris and Stefan Kruszewski (*Bulger*), and Motion for Summary Judgment (*Bulger*), including any supplemental filings in support of these motions.

- B7. All exhibits required for authentication of documents and things.
- B8. Published medical and scientific literature concerning Neurontin and Plaintiff's decedent's medical conditions.
- B9. Product information concerning Neurontin, including but not limited to package inserts.
- B10. Relevant documents contained in regulatory files, including but not limited to the Investigational New Drug Application ("IND"), New Drug Application ("NDA"), Supplemental New Drug Applications ("sNDA"), and safety surveillance and analysis files for Neurontin.
- B11. All documents and things identified in Defendants' prior Rule 26 disclosures.
- B12. All documents and things identified in Plaintiff's Rule 26 disclosures and/or otherwise identified or provided by Plaintiff.
- B13. All other documents and things produced, disclosed, or identified by Defendants to Plaintiff during the course of discovery.

To the extent any additional discovery and investigation provides additional facts and legal contentions that may substantially alter these disclosures, Defendants reserve the right to amend or supplement without prejudice any and all disclosures herein consistent with these developments, including identifying additional areas of information, relevant documents, and tangible things that support their claims or defenses in this case.

Pursuant to Fed. R. Civ. P. 26(b)(5), Defendants object to disclosure or production of documents and materials generated during the course of this litigation that constitute attorney work product or that contain privileged attorney-client communications. These documents and materials may consist, among others, of communications or correspondence between counsel and Defendants, correspondence between counsel and consulting experts, and between Defendants and employees to facilitate the rendering of legal advice. These documents may be exempt from discovery pursuant to Fed. R. Civ. P. 26(b)(3), 26(b)(4)(B), and/or the applicable attorney-client

and/or joint defense privilege.

Moreover, if Defendants identify certain documents that they believe contain trade secrets and other confidential research, development, or commercial information, such documents will be produced subject to the Amended Stipulated Protective Order entered by the Court.

C. Rule 26(a)(1)(C): A computation of any category of damages claimed by the disclosing party.

Not applicable.

D. Rule 26(a)(1)(D): For inspection and copying as under Rule 34 any insurance agreement under which any person carrying on an insurance business may be liable to satisfy part or all of a judgment which may be entered in the action or to indemnify or reimburse for payments made to satisfy the judgment.

Defendants are self-insured and have assets sufficient to satisfy any judgment that may be rendered in this matter.

Dated: March 4, 2009

Respectfully submitted,

SHOOK, HARDY & BACON L.L.P.

By



Scott W. Sayler
Lori McGroder
Lori Schultz

2555 Grand Blvd.
Kansas City, MO 64108
(816) 474-6550

David B. Chaffin
WHITE AND WILLIAMS
BBO #549245
100 Summer Street, 27th Floor
Boston, MA 02110
(617) 748-5200

ATTORNEYS FOR DEFENDANTS PFIZER
INC., PARKE-DAVIS, A DIVISION OF
WARNER-LAMBERT COMPANY AND
WARNER-LAMBERT LLC, WARNER-
LAMBERT COMPANY, AND
WARNER-LAMBERT COMPANY LLC


CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing Defendants' Third Supplemental Disclosure Statement was served on March 4, 2009, via electronic mail and U.S. mail, upon:

Jack London
3701 Bee Caves Road
Suite 200
Austin, TX 78746

Andrew G. Finkelstein
Eleanor L. Polimeni
Kenneth B. Fromson
Finkelstein & Partners LLP
436 Robinson
Newburgh, NY 12550

Thomas M. Sobol
Edward Notargiacomo
Hagens Berman Sobol Shapiro LLP
One Main Street
4th Floor
Cambridge, MA 02142



ATTORNEY FOR DEFENDANTS PFIZER
INC., PARKE-DAVIS, A DIVISION OF
WARNER-LAMBERT COMPANY AND
WARNER-LAMBERT LLC, WARNER-
LAMBERT COMPANY, AND
WARNER-LAMBERT COMPANY LLC